

Consumer Healthcare Products Association

FDA Joint Meeting Arthritis Advisory Committee and Drug Safety and Risk Management Advisory Committee

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OTC NSAIDs: Industry perspective and educational efforts

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**CONSUMER HEALTHCARE
PRODUCTS ASSOCIATION**

**Mission: Empower self-care by preserving and expanding
choice and availability of consumer healthcare products**

serving the self-medication industry since 1881

The Value of OTC Medicines

Trusted first-line of defense

for healthcare providers and consumers alike

Empower

individuals to meet their healthcare needs

Access

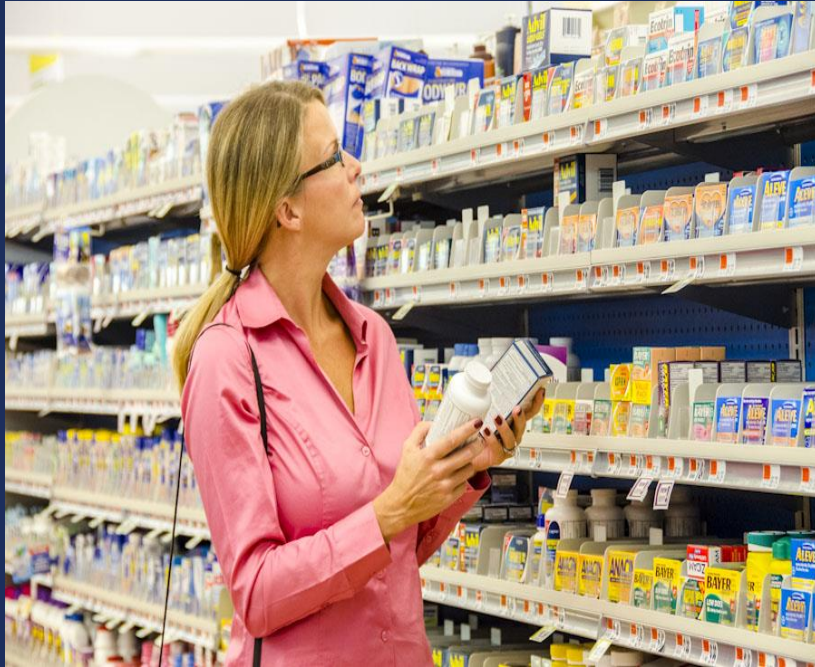
24/7 conveniently available healthcare options for busy families and caregivers

Affordable / Cost savings

- Affordable treatment options for both consumers and the U.S. healthcare system
- \$102 billion: estimated annual cost savings to the U.S. healthcare system (drug + clinician visit); each dollar spent on OTC medicines saves \$6-7¹

¹The Value of OTC Medicine to the United States, CHPA, 2012

The Value of OTC Analgesics



- Analgesics are widely used to treat everyday pains
 - Pain is the most common condition treated with an OTC¹
- OTC internal analgesics
 - 728 million packs sold/yr in the U.S.²
 - \$13.5 billion estimated annual cost savings to the U.S. healthcare system relative to alternatives to OTC analgesics³

¹ Henderson 2012

² The Nielsen Company, 52 weeks ending 12/30/17, all outlets

³ The Value of OTC Medicine to the United States CHPA, 2012

Oral OTC Analgesics - Ingredients

Consumers Benefit from a Variety of Ingredients

NSAIDs

Aspirin

Choline Salicylate,
Magnesium Salicylate,
Sodium Salicylate

Ibuprofen[†],
Naproxen[†]

Non-NSAIDs

Acetaminophen

- Product labeling reflects unique properties of each active ingredient

[†] PRECISION studied agents

NSAID: Non-steroidal anti-inflammatory drugs

[illegible]

Uses

- minor pain of arthritis
- muscular aches
- backache
- menstrual cramps
- headache
- toothache
- the common cold

Temporarily reduces fever

Aspirin Labeling

- Guides consumers to talk to their doctor regarding use of aspirin for cardioprotection
 - To address appropriate use,
 - Concomitant medications,
 - Monitor benefits and risks

Drug Facts	
Active ingredient (in each tablet) Aspirin 81 mg (NSAID)* *nonsteroidal anti-inflammatory drug	Purpose Pain reliever
Uses <ul style="list-style-type: none">• for the temporary relief of minor aches and pains or as recommended by your doctor. Because of its delayed action, this product will not provide fast relief of headaches or other symptoms needing immediate relief.• ask your doctor about other uses for Bayer Safety Coated 81 mg Aspirin	
Warnings <p>Reye's syndrome: Children and teenagers who have or are recovering from chicken pox or flu-like symptoms should not use this product. When using this product, if changes in behavior with nausea and because these symptoms could be an early sign of serious illness.</p> <p>Allergy alert: Aspirin may cause a severe allergic reaction in some people.</p> <ul style="list-style-type: none">• hives • facial swelling • asthma (wheezing) <p>Stomach bleeding warning: This product can cause stomach bleeding. The chance is higher if you:</p> <ul style="list-style-type: none">• are age 60 or older• have had stomach ulcers or bleeding problems• take a blood thinning (anticoagulant) or steroid• take other drugs containing prescription or non-prescription (aspirin, ibuprofen, naproxen, or others)• have 3 or more alcoholic drinks every day when taking this product• take more or for a longer time than directed <p>Do not use if you are allergic to aspirin or any of the ingredients listed below.</p>	
Ask a doctor before use if <ul style="list-style-type: none">• you have a history of stomach problems, such as heartburn• you have high blood pressure, heart disease, liver cirrhosis, or kidney disease• you are taking a diuretic• you have asthma <p>Ask a doctor or pharmacist before use if you are taking a prescription drug for • gout • diabetes • arthritis</p> <p>Stop use and ask a doctor if<ul style="list-style-type: none">• an allergic reaction occurs. Seek medical help right away.• you experience any of the following signs of stomach bleeding:<ul style="list-style-type: none">• feel faint • vomit blood • have bloody or black stools• have stomach pain that does not get better• pain gets worse or lasts more than 10 days• redness or swelling is present• new symptoms occur• ringing in the ears or a loss of hearing occurs<p>If pregnant or breast-feeding, ask a health professional before use. It is especially important not to use aspirin during the last 3 months of pregnancy unless definitely directed to do so by a doctor because it may cause problems in the unborn child or complications during delivery. Keep out of reach of children. In case of overdose, get medical help or contact a Poison Control Center right away.</p><p>Directions<ul style="list-style-type: none">• drink a full glass of water with each dose• adults and children 12 years and over: take 4 to 8 tablets every 4 hours not to exceed 48 tablets in 24 hours unless directed by a doctor• children under 12 years: consult a doctor</p></p>	

Uses

For the temporary relief of minor aches and pains or as recommended by your doctor

- OTC aspirin drug products with CV related images: Talk to your doctor or other healthcare provider before using this product for your heart [†]

[†] FDA Nov 2017; Recommended Statement for OTC Aspirin-Containing Drug Products Labeled With Cardiovascular Related Imagery

NSAID CV Safety - History

1980 [...] 2000 2005 2010 2015 2018

Observations from clinical trials[†] raised safety **concerns regarding CV events** associated with certain NSAIDs

In Vivo / Ex Vivo Observation of interaction between certain NSAIDs and aspirin, resulting in **potential impaired aspirin antiplatelet effects[‡]**
(no effect observed with APAP)

Advisory committee (AC) meetings

- AAC/DSaRM AC Meetings (2005, 2014)

FDA-mandated label changes

- The potential CV risk associated with the use of NSAIDs was added to the USPI of all Rx NSAIDs, and in the warnings section of OTC non-aspirin NSAIDs labels

FDA-Science paper for HCPs (2006)¹

- Provide recommendation regarding timing of dosing of ibuprofen to minimize the ASA interactions

FDA-mandated CV safety clinical trials

- PRECISION

Recent findings

- PRECISION (2016)
- Gurbel (2018)

[†] Prescription-strength and supratherapeutic doses; [‡] Clinical implications of these observed interferences remain unknown; HCP: Healthcare providers; ¹ FDA 2006

OTC NSAIDs - Labeling

CV Risk

Potential
increased risk
of CV events

Drug Facts	
Active ingredient (in each tablet) Ibuprofen 200 mg (NSAID)*	Purpose Pain reliever/Fever reducer *nonsteroidal anti-inflammatory drug
Uses <ul style="list-style-type: none">temporarily relieves minor aches and pains due to:<ul style="list-style-type: none">headachetoothachebackachemenstrual crampsthe common coldmuscular achesminor pain of arthritistemporarily reduces fever	
Warnings <p>Allergy alert: Ibuprofen may cause a severe allergic reaction to aspirin. Symptoms may include:</p> <ul style="list-style-type: none">hivesfacial swellingasthma (wheezing)shockskin reddeningrashblisters <p>If an allergic reaction occurs, stop use and seek medical attention immediately. This product may cause severe stomach bleeding. The chance is higher if you:</p> <ul style="list-style-type: none">are age 60 or olderhave had stomach ulcers or bleeding problemstake a blood thinning (anticoagulant) or other drugs containing prescription ibuprofen, naproxen, or others]have 3 or more alcoholic drinks every daytake more or for a longer time than directed <p>Heart attack and stroke warning: NSAIDs can increase the risk of heart attack, heart failure, and stroke. These risks may be greater if you have heart disease or other risk factors. Stop use and seek medical attention if you experience symptoms of heart attack or stroke, such as chest pain, shortness of breath, weakness, or swelling in the legs.</p>	
Do not use <ul style="list-style-type: none">if you have ever had an allergic reaction to any other pain reliever/fever reducerright before or after heart surgery	
Ask a doctor before use if: <ul style="list-style-type: none">stomach bleeding warning applies to youyou have problems or serious side effects from taking pain relievers or fever reducersyou have a history of stomach problems, such as heartburnyou have high blood pressure, heart disease, liver cirrhosis, kidney disease, asthma, or had a blood clotyou are taking a diuretic	
Ask a doctor or pharmacist before use if you are: <ul style="list-style-type: none">older a doctor's care for any medical conditiontaking aspirin for heart attack or stroke, because ibuprofen may decrease this benefit of aspirintaking any other drug	
When using this product <ul style="list-style-type: none">take with food or milk if stomach upset occurs	
Stop use and ask a doctor if: <ul style="list-style-type: none">you experience any of the following signs of stomach bleeding:<ul style="list-style-type: none">heart burnstomach painnausea or black stoolshave stomach pain that does not get betteryou have symptoms of heart problems, such as:<ul style="list-style-type: none">chest painbreast tendernessweakness in one part or side of the bodyslurred speechleg swellingpain gets worse or lasts more than 15 minutesheart gets worse or lasts more than 3 daysbreathless or swelling is present in the legsany new symptoms appear	
Other information <ul style="list-style-type: none">Keep out of reach of children. In case of overdose, get medical help or contact a Poison Control Center right away.Do not take more than directed.The maximum effective dose should not be used.Adults and children 12 years and over: Take 1 tablet every 6 to 8 hours while symptoms persist.Do not exceed 6 tablets in 24 hours, unless directed by a doctor.Do not use for more than 10 days to relieve pain or 3 days to reduce fever.Do not use for more than 10 days to relieve pain or 3 days to reduce fever.	
Read the important information about ibuprofen on the label and package insert. Stop use and ask a doctor if you experience symptoms of heart attack or stroke, such as chest pain, shortness of breath, weakness, or swelling in the legs.	
Questions or comments? Call toll free 1-800-441-4242.	

Ibuprofen labeling
addresses
potential
impairment of
cardioprotective
effects of aspirin

OTC NSAIDs - Labeling

CV Risk

Ibuprofen / Naproxen

Drug Facts	
Active ingredient (in each tablet) Ibuprofen 200 mg (NSAID)* *nonsteroidal anti-inflammatory drug	Purpose Pain reliever/Fever reducer
Uses	
<ul style="list-style-type: none">temporarily relieves minor aches and pains due to:<ul style="list-style-type: none">headachetoothachebackachemenstrual crampsthe common coldmuscular achesminor pain of arthritistemporarily reduces fever	
Warnings	
<p>Allergy alert: Ibuprofen may cause a severe allergic reaction to aspirin. Symptoms may include:</p> <ul style="list-style-type: none">hivesfacial swellingasthma (wheezing)shockskin reddeningrashblisters <p>If an allergic reaction occurs, stop use and seek medical attention immediately.</p> <p>Stomach bleeding warning: This product can cause stomach bleeding. The chance is higher if you:</p> <ul style="list-style-type: none">are age 60 or olderhave had stomach ulcers or bleeding problemstake a blood thinning (anticoagulant) or other drug that affects the bloodhave 3 or more alcoholic drinks every day while using this producttake more or for a longer time than directed <p>Heart attack and stroke warning: NSAIDs, except aspirin, increase the risk of heart attack, heart failure, and stroke. These can be fatal. The risk is higher if you use more than directed or for longer than directed.</p>	
Do not use	
<ul style="list-style-type: none">if you have ever had an allergic reaction to any other pain reliever/fever reducerright before or after heart surgery	
Ask a doctor before use if	
<ul style="list-style-type: none">stomach bleeding warning applies to youyou have problems with your stomach	
When using this product	
<ul style="list-style-type: none">take with food or milk if stomach upset occurs	
Stop use and ask a doctor if	
<ul style="list-style-type: none">you experience any of the following signs of stomach bleeding:<ul style="list-style-type: none">feel faintvoiced bloodhave bloody or black stoolshave stomach pain that does not go awayyou have symptoms of heart problems:<ul style="list-style-type: none">chest paintrouble breathingswelling in one part or both parts of your bodyleg swellingpain gets worse or lasts more than 10 days (or 7 days if you are 60 years of age or older)redness or swelling is present at the site of applicationany new symptoms appear	
Directions	
<p>Do not take more than directed.</p> <p>The smallest effective dose should be used.</p> <p>Adults and children 12 years and over: Take 1 tablet every 4 to 6 hours while symptoms persist.</p> <p>Children 6 years and over: Do not exceed 1 tablet, 2 tablets may be used.</p> <p>Do not exceed 6 tablets in 24 hours, unless directed by a doctor.</p> <p>Children under 6 years: Ask a doctor.</p>	
Other information	
<ul style="list-style-type: none">Read all warnings and directions before use. Keep container closed at all times.Do not use if the seal is broken.	
Contains aspirin	
<p>Contains aspirin. Do not take with other aspirin-containing products.</p> <p>Contains aspirin. Do not take with other aspirin-containing products.</p> <p>Contains aspirin. Do not take with other aspirin-containing products.</p>	
Questions or comments? Call toll free 1-800-441-4444.	

Warnings

Heart attack and stroke warning:

NSAIDs, except aspirin, increase the risk of heart attack, heart failure, and stroke. These can be fatal. The risk is higher if you use more than directed or for longer than directed.

OTC Ibuprofen - Labeling[†] Addresses Concomitant Use with Aspirin

[illegible]

Warnings

Ask a doctor or pharmacist before use if you are
Taking aspirin for heart attack or stroke, because
ibuprofen may decrease this benefit of aspirin

[†] Inconsistencies exist across OTC NSAIDs labels (e.g. naproxen)

OTC NSAIDs

Limitation of Current Findings

- Data have been generated under prescription use conditions (high dose, long duration, chronic pain)
 - Most publications discussing OTC NSAID CV safety extrapolate data from these conditions.
- The relevance of the aspirin interaction studies to CV outcomes has not been clearly demonstrated.
- Available data suggest that there is no increased CV risk when OTC formulations of these agents are used as directed¹

¹ White 2018

VISION:

Happier, healthier lives through responsible self-care



MISSION:

Empower self-care by preserving and expanding choice and availability of consumer healthcare products

STRATEGIC PRIORITIES:

- Reinforce value and vital role in society
- Promote safe and responsible use
- Foster constructive regulatory environment
- Ensure continued access
- Maintain knowledgeable industry community



CHPA EDUCATIONAL
FOUNDATION

MISSION:

To be the trusted source of information on the responsible use of consumer healthcare products including over-the-counter medicines and dietary supplements

STRATEGIC PRIORITIES:

Consumers use, store, and dispose of OTC medicines responsibly; educate consumers to:

- Read and follow the medicine label
- Safeguard your medicines
- Dispose of your medicines safely

OTC medicines can help you treat a variety of ailments. Be confident in the decisions you make to use, store, and dispose of your medicines safely.



How to Read Your Medicine Label

Always read and follow the Drug Facts label on your over-the-counter medicine to make sure you're using it appropriately.

[▶ Read More](#)



Are Your Medicines Stored Up and Away?

Approximately 60,000 children end up in emergency departments each year because they got into medicines while their parent or caregiver was not looking.

[▶ Read More](#)



The Do's and Don'ts of Drug Disposal

Before you clean out the expired or unwanted medicines in your home, make sure you know how to properly dispose of them.

[▶ Read More](#)

National Education Campaigns

Treat with
Care



Put your medicines
up AND away
and out of sight



KnowYourDose.org
Acetaminophen Awareness Coalition



**OTC Pain Reliever
Education Campaign**



OTC Pain Reliever Education Campaign

The screenshot shows the homepage of knowyourOTCs.org. The navigation bar includes links for Home, Symptoms, Medicine Cabinet, For Parents, Tools, News & Experts, and FAQ. A search bar is located below the navigation bar. The main content area features the heading 'WHAT'S ON THE LABEL?' in large orange letters, followed by the subheading 'Things to Keep in Mind When Choosing and Using an OTC Pain Reliever'. Below this, there is a paragraph of text and an image of two OTC pain reliever bottles. The text explains that OTC medicines allow consumers to choose a product that safely and effectively treats their symptoms, and that it is important to keep in mind that their health conditions and/or lifestyle could play a role in their choice. It also mentions that the Drug Facts label on OTC pain relievers and the information below can help. At the bottom, it says 'Use the tool below to develop a personalized OTC pain reliever reference document.'

What if I am taking other medications?

When taking either acetaminophen or NSAIDs, it's important to talk to your doctor before use if you are:

ACETAMINOPHEN	NSAIDs
Acetaminophen ^ <ul style="list-style-type: none">• Taking another OTC medicine to treat pain or fever—it may contain acetaminophen• Taking prescription medicines containing acetaminophen• Taking the blood-thinning drug warfarin	Ibuprofen ^ <ul style="list-style-type: none">• Taking aspirin for heart attack or stroke—ibuprofen may decrease this benefit of aspirin• Taking a blood-thinning or steroid drug• Taking other drugs containing an NSAID
	Naproxen Sodium v
	Aspirin v
	Magnesium Salicylate v

OTC Analgesics

Favorable Benefit-Risk

- There is a significant need for OTC analgesics.
- OTC analgesics are commonly used and have demonstrated safety and effectiveness in the self-treatment of a broad range of acute painful conditions¹
- Safety is continuously monitored
 - Pharmacovigilance evaluations have not identified CV risk signals
 - Available data continue to support favorable benefit-risk
- Members are committed to working with FDA to provide appropriate labeling
- Educational efforts will continue

¹ Moore 2015